

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

UNITED STATES OF AMERICA)	CRIMINAL NO. 1:05cr11
)	
v.)	
)	
TANIKKA R. BROOKS,)	
)	Judge: Claude M. Hilton
Defendant.)	

STATEMENT OF FACTS

_____The United States and the defendant, TANIKKA R. BROOKS (“defendant”), agree that were this case to go to trial, the United States would prove beyond a reasonable doubt, by competent and admissible evidence, the following:

_____1. On or about March 2002, defendant became employed as a receptionist at Community Family Life Services, Inc. (“CFLS”), 305 E. St. NW, Washington, D.C. 20001. CFLS provides counseling services to indigent residents of Washington, D.C.

2. As a receptionist at CFLS, defendant was responsible for sorting and distributing mail delivered to CFLS. Some CFLS clients received Social Security benefit checks, District of Columbia Department of Employment Services benefit checks, United States Treasury tax refund checks, Veterans Administration pension checks, and other personal mail at CFLS, and defendant was responsible for distributing such mail to CFLS clients.

3. From on or about April 8, 2002, until on or about March 1, 2004, defendant knowingly and intentionally devised and engaged in a scheme and artifice to obtain moneys owned by a financial institution by means of false and fraudulent pretenses and representations.

4. As part of such scheme and artifice, defendant opened mail addressed to CFLS clients without the knowledge or consent of the clients to whom the mail was addressed and in contravention of CFLS rules and policy.

5. As a further part of such scheme and artifice, defendant received and misappropriated Social Security and District of Columbia Department of Employment Services benefit checks, United States Treasury tax refund checks, and Veterans Administration pension checks issued to CFLS clients without the knowledge or consent of the intended beneficiaries of the checks and in contravention of CFLS rules and policy.

6. As a further part of such scheme and artifice, defendant knowingly and wilfully forged the signatures of the CFLS clients to whom such checks were issued onto the backs of the checks in order to make it appear as if the CFLS clients had themselves endorsed the checks. Defendant did so without the knowledge or consent of the intended beneficiaries of the checks.

7. As a further part of such scheme and artifice, defendant endorsed the checks issued to CFLS clients to herself by writing "Paid to the Order of Tannika R. Brooks" on the backs of the checks. Defendant did so without the knowledge or consent of the intended beneficiaries of the checks.

8. As a further part of such scheme and artifice, defendant deposited the checks into her personal checking account at Branch Banking and Trust Company ("BB&T"), account number

5138568506. Defendant subsequently withdrew funds from her personal checking account at BB&T for her personal use without the knowledge or consent of the intended beneficiaries of the checks.

____9. Defendant made such deposits at automatic teller machines (“ATMs”) in Alexandria, Virginia, and Springfield, Virginia, within the Eastern District of Virginia.

10. BB&T deposits are insured by the Federal Deposit Insurance Corporation (“FDIC”).

11. Defendant knowingly and willfully received and deposited into her BB&T bank account proceeds from checks issued to eighteen different persons totaling \$21,796.50 without the knowledge or consent of the intended beneficiaries of the checks. Specifically, defendant deposited proceeds from the following checks:

<u>Payee</u>	<u>Check Number</u>	<u>Amount</u>
Andrew C. Hython	5817810	\$80.00
Andrew C. Hython	5804752	\$80.00
David E. McNeil	2219-41801994	\$781.00
David E. McNeil	2219-41127124	\$737.00
Dorothy Daily	2050-25047606	\$165.00
Dorothy Daily	2049-66299059	\$595.00
Dorothy F. Harrison	2305-43199854	\$1,644.00
Ernest R. McKee	2048-58661902	\$575.00
Ernest R. McKee	2048-60279481	\$575.00
James H. Taylor	2049-99676902	\$323.00
James H. Taylor	2048-62461050	\$329.00
James J. Blinker-Floyd	4023-99333538	\$490.50

Johnnie Nelson	2058-17717713	\$591.00
Kevin C. Williams	3031466	\$164.00
Larry E. Turner	2306-01835236	\$352.00
Leroy Headspeth	4024-41934504	\$496.80
Manuel Pierce	794104	\$44.00
Pervis McKenney	4022-07317209	\$552.00
Pervis McKenney	4022-07365885	\$6,624.00
Pervis McKenney	4024-64126734	\$552.00
Pervis McKenney	4024-67299746	\$552.00
Pervis McKenney	4024-70462049	\$552.00
Pervis McKenney	4024-73602509	\$564.00
Pervis McKenney	4024-76741948	\$564.00
Pervis McKenney	4024-79877938	\$564.00
Reginald X. Scott	4023-99139744	\$766.80
Stephen Kinzer	2652367	\$137.00
Timothy D. Witcher	2621259	\$182.00
Walter H. Mathesius	2572554	\$718.00
William L. Brown	4024-45449842	\$552.00
Undetermined		<u>\$894.40</u>
		<u>\$21,796.50</u>

_____ 12. The above actions were undertaken by the defendant knowingly and with intent to do that which the law forbids and were not undertaken by mistake, accident, or some other innocent reason.

Respectfully submitted,

Paul J. McNulty
United States Attorney

By: _____
Joshua P. Jones
Special Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, Tanikka R. Brooks, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

Tanikka R. Brooks

I am Tanikka R. Brooks's attorney. I have carefully reviewed the above Statement of Facts with her. To my knowledge, her decision to stipulate to these facts is an informed and voluntary one.

George Wooditch, Esquire
Attorney for Tanikka R. Brooks